

EXHIBIT 7

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**UNITED STATES OF AMERICA ex
rel.
CAMERON JEHL,**

Plaintiffs,

v.

**GGNSC SOUTHAVEN LLC D/B/A
GOLDEN LIVING CENTER-
SOUTHAVEN et al.**

Defendants.

Case No. 3:19cv091-MPM-JMV

**DECLARATION OF MARK S. BRENNAN, SR., ESQUIRE IN SUPPORT OF
DEFENDANTS' APPLICATION FOR ATTORNEYS' FEES AND OTHER
EXPENSES**

I, Mark S. Brennan, Sr., Esquire, attorney at law, having personal knowledge of the facts contained in this Declaration and being competent to testify to them, hereby state as follows:

1. I am presently a principal in the law firm of Woods Rogers Vandeventer Black, PLC (and formerly a partner in the law firm of Vandeventer Black, LLP at all times relevant to the legal representation of Defendants in the Jehl Matter). I represented Defendants in this matter from April 24, 2020, to March 22, 2021.

2. I have routinely represented long term healthcare facilities for the past 34 years in licensure, regulatory, and liability defense cases, including Golden Living and its affiliates across the Commonwealth of Virginia. I was retained to investigate the licensure in the Commonwealth of Virginia of Lionelle Trofort, R.N. in response to allegations by Cameron Jehl that Ms. Trofort's license (a) was improperly issued in Virginia and (b) that she had therefore illegally

practiced nursing without a license. I was assisted by my paralegal Ms. Patricia Gitlin in this work. The specific details and scope of my representation, including but not limited to, multiple Virginia Freedom of Information Act requests, are reflected in the attached invoice/bills for legal services rendered (See Exhibit 1).

3. My firm charged \$225.00 per hour for my services and \$115.00 an hour for my paralegal's services in the matter at hand in 2020 and 2021, and my bills were paid in full by Defendant(s). My rate is reasonable and consistent with rates billed by attorneys within the legal community.

4. My former law firm's billing statements specifically detailed the work that was done on this case by Ms. Gitlin and me. *See* Exhibit 1. The number of hours expended on all legal tasks was reasonable and necessary, given the complexity, length, and importance of representation. In particular, evalutaing of state nurse licensure issues in a \$30 million FCA action is a complex task necessitating extensive review and legal analysis. I billed no expenses.



Mark S. Brennan, Sr., Esquire

Executed on this 26th day of April, 2023